

Brad T. Hunsicker
(Wyoming State Bar No. 7-4579)
WINSHIP & WINSHIP, P.C.
100 North Center Street, Sixth Floor
PO Box 548
Casper, WY 82602

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In re:)
)
WESTERN BIOMASS ENERGY, LLC,) Case No. 12-21085
) CHAPTER 11
Debtor.)
)

MOTION TO WITHDRAW AS COUNSEL

COMES NOW Brad T. Hunsicker of Winship & Winship, P.C. (“Movant”), attorney for the above named Debtor, and hereby moves the Court to allow Movant to withdraw from further representation of the Debtor in the above case, on the basis that there is no longer an acting manager, the Debtor’s majority controlling member, Blue Sugars Corporation, has now filed for bankruptcy protection under Chapter 7 in the United States Bankruptcy Court for the District of Nevada, Case No. 3:13-bk-50937, and there does not appear to be any unencumbered funds to satisfy ongoing legal fees that will be incurred with further representation.

WHEREFORE Movant requests that the Court allow him to withdraw from further representation of Debtor in this case.

DATED this 27th day of August, 2013.

By: /s/
Bradley T. Hunsicker

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NOTICE TO DEBTOR

Please take notice that you are responsible for complying with all court orders, the time limitations established by the Bankruptcy Court and the applicable rules. The undersigned will provide you with the deadlines and dates, if any, that are set by the Court. The following is a list of pending deadlines or hearings set in the above matter:

Meeting of Creditors 341(a) meeting to be held on 9/3/2013 at 01:30 PM at New Bldg - Burkitt Street, 2nd Floor Public Meeting Room 210, Sheridan Courthouse, Sheridan, WY.

Order Scheduling Hearing on First Application of Lindquist & Vennum For Allowance of Compensation and Reimbursement of Expenses (related document(s):[190] Application for Compensation). Hearing scheduled for 9/12/2013 at 10:30 AM by Telephone Conference.

Other deadlines and hearings are listed on the attached notice.

_____/s/_____
Bradley T. Hunsicker

CERTIFICATE OF SERVICE

I, Brad T. Hunsicker, hereby certify that a true and correct copy of the foregoing **Motion to Withdraw as Counsel** was served *electronically* upon the **Office of the U.S. Trustee**, and **all parties requesting notice and registered on the CM/ECF system as stated in the mailing matrix attached hereto** and served upon **Western Biomass Energy, 525 University Loop #111, Rapid City, SD 57701** by depositing copies in the United States mail, postage prepaid, addressed as above, this 27th day of August, 2013.

_____/s/_____
Bradley T. Hunsicker